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## Environmental Protection Agency Alaska Operations Office

# RCRA Compliance Evaluation Inspection Report

COPY

Facility Name:

Mapco Alaska Petroleum Inc.

Facility Location:

North Pole, Alaska

Facility EPA ID#:

AKD000643239

Company Representative:

Kathleen McCullom, Environmental

Coordinator

Mapco Alaska Petroleum, Inc.

P1100 H&H Lane

North Pole, Alaska 99705

(907) 488-2741

Date of Inspection:

July 29, 1991

Date of Report:

August 23, 1991

EPA Lead Inspector:

Kurt A. Eilo

Hazardous Waste Coordinator

U.S. EPA - Alaska Operations Office

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IMAGES

### I. Introduction:

On July 29, 1991, EPA and the Alaska Department of Environmental Conservation (ADEC) conducted a RCRA compliance evaluation inspection of Mapco Alaska Petroleum Inc. hazardous waste activities. The facility was notified of the inspection the morning of the inspection to assure that appropriate personnel would be available. The inspection began by explaining the purpose and objectives of the inspection to Kathleen McCullom, and Gerald Fritz. EPA credentials were presented to Kathleen McCullom and Gerald Fritz.

This inspection report will describe the observations made during the inspection and will identify the inspectors concerns and the potential violations of applicable EPA regulations under Resource Conservation and Recovery Act (RCRA), and applicable State of Alaska Hazardous Waste Regulations. This report will not evaluate the ongoing corrective actions under the 3008(a) Complaint and Compliance Order and a 3008(h) Administrative Order on Consent issued subsequent to the 1987 RCRA CEI.

# II. Applicable RCRA Subtitle C Regulations:

- 40 CFR 262 -Standards Applicable to Generators of Hazardous Waste (18 AAC 62.210)
- 40 CFR 265 -Interim Status Standards for Owners and Operators of Hazardous Waste Treatment, Storage, and Disposal Facilities (18 AAC 62.410)
- 40 CFR 268 -Land Disposal Restrictions
- 40 CFR 270 -EPA Administered Permit Programs: The Hazardous Waste Permit Program

# III. Background/Record Review:

Mapco Alaska Petroleum Inc. (Mapco) operates as a small quantity generator of hazardous waste as a result of petroleum refining activities. As a result of the 1987 RCRA CEI, EPA issued a 3008(a) Complaint and Compliance Order and a 3008(h) Administrative Order on Consent. Mapco is currently operating a groundwater petroleum product recovery system as part of this consent order.

On March 12, 1987, Mapco notified EPA of their hazardous waste activities as a generator of hazardous waste.

RCRA Compliance Evaluation Inspections (CEI) have been conducted at the Western Operating Area facility annually since 1987.

According to Kathleen McCullom, Mapco has provided personnel training for employees that handle hazardous waste in addition to OSHA training requirements. For operators involved in handling K050 and other hazardous wastes, this training includes a annual 1 hour course on hazardous waste and housekeeping and on-the-job refresher training. Operators that handle tetraethyl lead (lead additive for lead gasoline) also receive specialized training from Ethyl Corporation.

Kathleen McCullom outlined the types of wastes typically generated at Mapco:

K050 - heat exchanger bundle sludge - 1 to 2 55 gal. drums/year

F037 - oily wastewater separator sludge - 2 drums/year (previously manifested as D001)

D008 - tetraethyl lead - absorbent pads

D018 - wastewater and stormwater from tank 192 (run through air stripper and discharged to lagoon system)

waste oil - vehicle maintenance (sent to Seeking Ford for energy recovery)

kerosene baths - maintenance facility - (recycled in plant after halogens testing)

electraclean - halogenated solvent

laboratory - D009 - mercury thermometers/contaminated debris

nonhazardous waste absorbent pads - (sent to Northslope borough incinerator)

propylene glycol

sulfolane (previously consider hazardous waste under EP Tox)

Manifests were reviewed from the date of previous CEI to the date of this inspection and no potential violations were observed by the inspectors as a result of this CEI (see Attachment 1). Facility manifests also identify that the facility generates waste paint and paint thinners with chromium (D007).

Attachment 2 includes a map of the Mapco facility. Attachment 3 is the Mapco response to the outbriefing of this inspection.

# IV. Field Inspection:

### Plant heat exchangers -

The inspection team viewed various heat exchangers throughout the facility. The routing cleaning of these heat exchangers generates K050 hazardous waste (see photos 1-2).

### Sump 05-7 -

This sump was undergoing closure as part of the consent order (see photo #3).

## Sump 901 -

This sump is undergoing closure/corrective action and was the previous site of disposal of navy solvent (see photo #4).

#### Tank 192 -

This tank is used to store oily water prior to segregation and treatment (see photo #5).

## Effluent Building

The effluent building is now used to add products into the crude oil. According to Kathleen McCullom, this area is a satellite storage area (see photo #6). There was 1 55 gal. drum of F037 sump sludge which was collected from various areas throughout the plant. Kathleen McCullom explained that the drum may be moved to each of the sump sludge areas for collection of the waste. The drum is inspected daily by operators. An accumulation start date was marked as 5/10/91 and a hazardous waste label was placed on the side of the drum.

This drum does not appear to be under the control of the operator of the process generating the waste and is not at or near the point of generation and therefore does not appear to meet the definition of a satellite storage area. 40 C.F.R. § 262.34(c)(1) specifies that a generator may accumulate as much as 55 gallons of hazardous waste in containers at or near any point of generation where wastes initially accumulate, which is under the control of the operator of the process generating the waste. According to Kathleen McCullom, Mapco conducts daily inspections of this hazardous waste and appears to have marked the drum in accordance with 40 C.F.R. § 262.34(a). The container was not in storage for greater than 90 days based upon the accumulation start date as marked. I explained to Kathleen McCullom that this area probably would not

constitute a satellite storage area and although it appeared as if there was no violation, Mapco might be in violation if the drum was stored in excess of 90 days.

There was 1 drum of sulfolane in storage at the effluent building which is considered to be nonhazardous since the TC rule became effective according to Mapco.

## Hazardous Waste Storage Area -

The hazardous waste storage area consists of a concrete diked pad and a fence. A 55 gal drum of K050 heat exchanger bundle sludge, and a 15 gal drum containing electraclean, a F001, F002 waste, was in storage at the time of the inspection. The K050 drum had a hazardous waste label and the accumulation start date was marked as 5/2/91. The F001, F002 drum also had a hazardous waste label and was marked as 4/11/91 (see photo #7). Kathleen McCullom explained that inspections are conducted at least weekly for this storage area.

### Lagoon B -

Lagoon B was taken out of service as a result of ongoing corrective actions. A new liner was being installed at the time of the inspection (see photos 8-9). Lagoon B will be used as holding basin to avoid shocking the treatment facility during high flow periods.

### Lagoon C -

Lagoon C is shown in photo #10. The lagoon is lined similar to lagoon A and B.

#### Fire Training Area -

The fire training area is shown in photo 11. The area has been lined since about 1988.

#### Lagoon A -

Lagoon A received a new liner in 1991 (see photo 12). Lagoon A will hold approximately 1 million gallons.

#### Laboratory -

The laboratory generates mercury waste (D009) including spill debris from mercury thermometers. Outside the laboratory door was a 35 gal container labeled as

Mercury Spill Debris (see photos 13-14). There was no accumulation start date on the container. According to Kathleen McCullom, Mapco operates this site as a satellite accumulation area and that a date on the container would not be required until the container is full or 55 gallons of waste has been accumulated. 40 C.F.R. § 262.34(c)(1) specifies that a generator may accumulate as much as 55 gallons of hazardous waste in containers at or near any point of generation where wastes initially accumulate, which is under the control of the operator of the process generating the waste. The container does not appear to be at or near the point of generation and under control of the operator.

## Infiltration Gallery -

The airstrippers used a part of the corrective action process are shown in photo #15.

# V. Outbriefing:

At the completion of the field portion of the inspection Kathleen McCullom, and Gerald Fritz were briefed on the following concerns identified by the inspectors:

- 1. The storage area at the Effluent building should be managed as a less than 90 day storage area.
- The laboratory satellite accumulation area was not at or near the point or generation or under the control of the operator.

# VI. Findings:

40 C.F.R. § 262.34(c)(1) specifies that a generator may accumulate as much as 55 gallons of hazardous waste in containers at or near any point of generation where wastes initially accumulate, which is under the control of the operator of the process generating the waste. The container at the laboratory does not appear to be at or near the point of generation and under control of the operator.

# **ATTACHMENTS**

Attachment 1 - Mapco Hazardous Waste Manifests

Attachment 2 - Facility Map

Attachment 3 - Mapco 1991 CEI Response to Outbriefing

# **PHOTOGRAPHS**

## **PHOTOGRAPHS**

Photo #1 - heat exchangers

Photo #2 - heat exchangers

Photo #3 - sump 05-7

Photo #4 - sump 901

Photo #5 - tank 192

Photo #6 - effluent building

Photo #7 - hazardous waste storage area

Photo #8 - lagoon B

Photo #9 - lagoon B

Photo #10- lagoon C

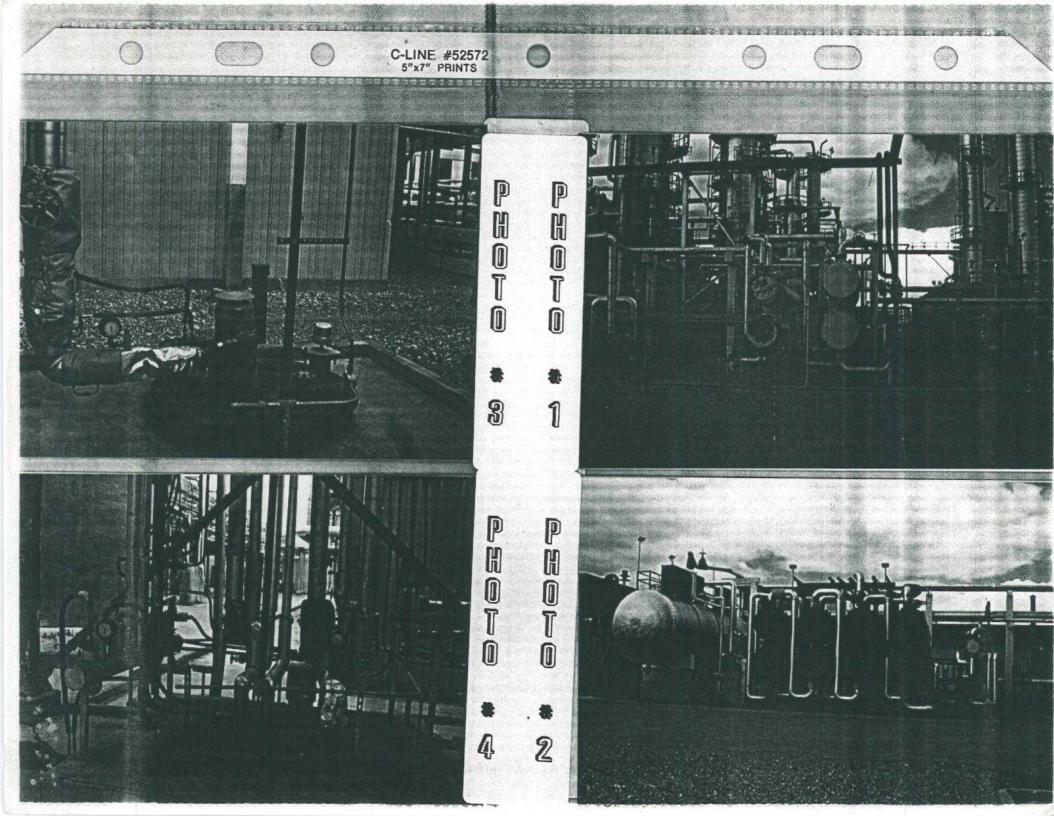
Photo #11- fire training area

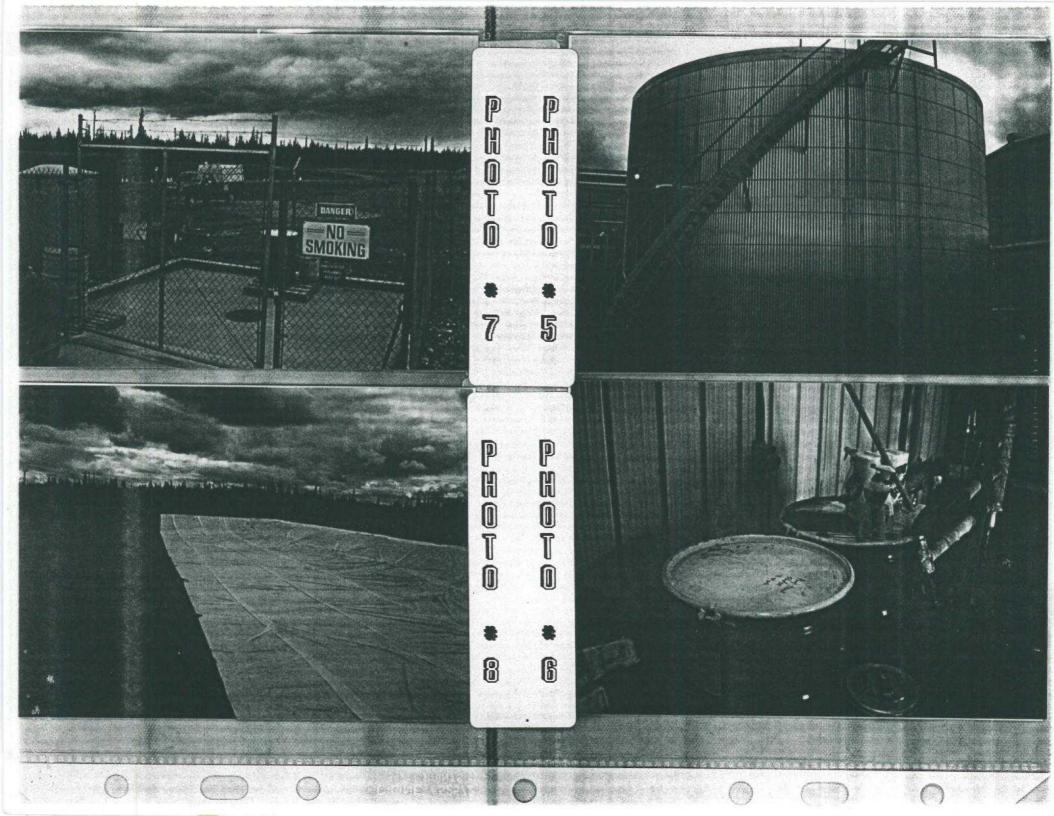
Photo #12- lagoon A

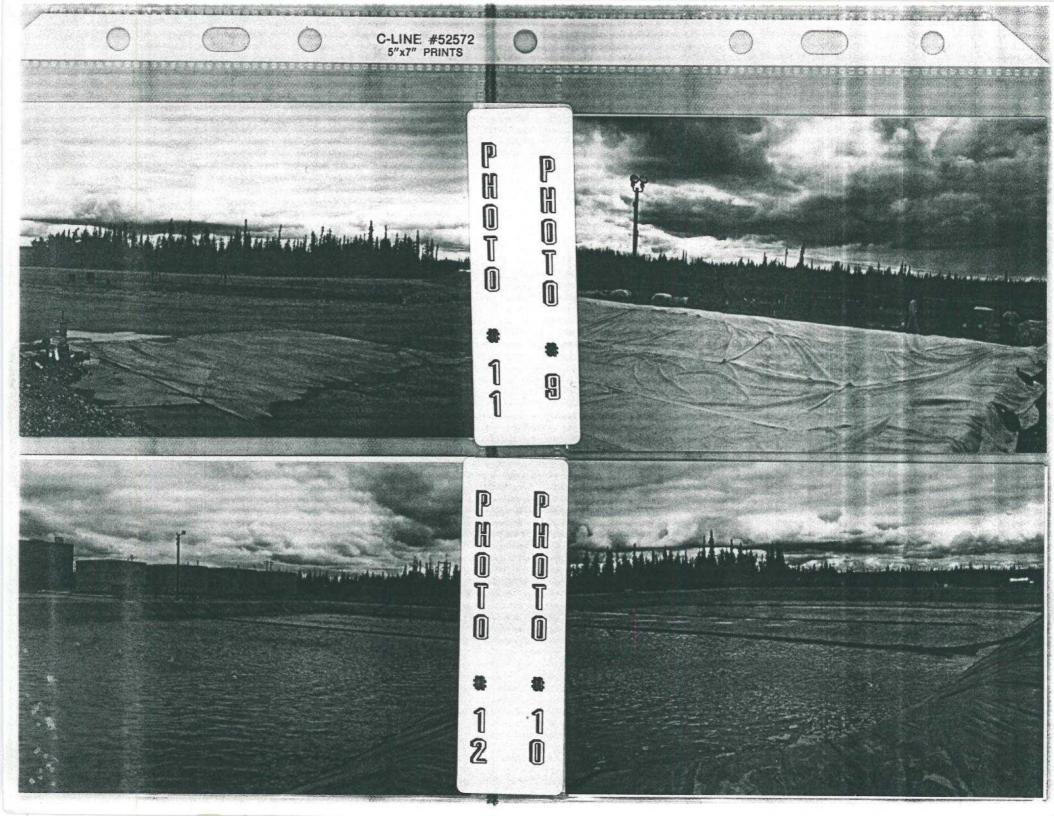
Photo #13- laboratory

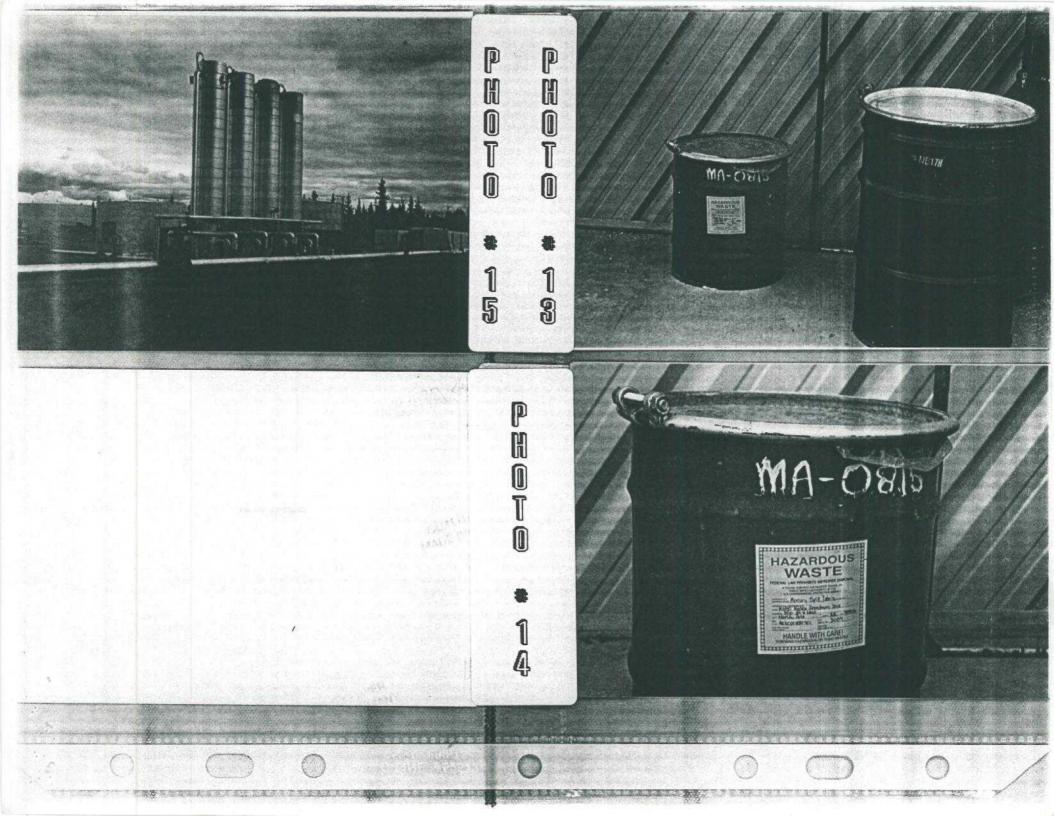
Photo #14- laboratory

Photo #15- infiltration gallery - air strippers









# ATTACHMENT #1

P.O.#27666 2-2.

Job ##-14-698 Trailer #3129

Form Approved, OMB No. 2050-0039, Expires 9-30-91 Please print or type. (Form designed for use on elite (12-pitch) typewriter.) UNIFORM HAZARDOUS 1. Generator'S US EPA ID No. Manifest Document No 2 Page 1 Information in the shaded areas AKD00850701-AKD00085070||###00- NPROB is not required by Federal law. 3. Generator's Name and Mailing Address (N) 5(1) Mapco, Alaska Petroleus, Inc. 1100 H & H Lane, North Pole, Alaska 99905 4. Generator's Phone (987) 488-2741 5. Transporter 1 Company Name US EPA ID Number Morthwest EnviroService, Inc. AKD983068602 7. Transporter 2 Company Name US EPAID Number Lyaden Transport, Inc. F. Transponer's Phone (907) 276 WAD002799260 Northwest EnviroService, Inc. 1500 Airport Way South Seattle, Washington 98134 WAD058367152 12. Containers 14. Unit Waste No. 11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number) Total Unit No. -Type Waste combustible liquid, n.o.s. a. 20 (mineral spirits, chromium) DM (D001) Combustible liquid, NA1993 A Waste flammable liquid, n.o.s. 0 (Petroleum distillates) DĦ Flammable liquid. (D001) UN1993 Waste Combustible Liquid n.o.s. (Petroleum Distillates, Chromium) DH Combustible Liquid MA1993 DOOLFTTO d J. Additional Descriptions for Materials Listed Above K. Handling Codes for Wastes Listed Above a) size that (805) (easte gashid with chrosina) ). San dystach) (4) 50(c, 50/2) 15. Special Handling Instructions and Additional Information 7D a) Drum MA-0953 (35 gal) b) Drum MA-0940 (55 gal) C) Drug MA 0955 ( S gai) 16. GENERATOR'S CERTIFICATION: I nereby declare that the contents of this concignment are fully and accurately described above by rail, and weter proper shipping name and are classified, packed, maked, and raceled, and are in an respects in proper condition for transport by highway crding to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford. Month Day Year 17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name Month Day Year KEITEZ 05 19/ ARRY 18. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name Month Day Year 19. Discrepancy Indication Space 20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19. Printed/Typed Name Signature Month Day Year DRUMHELLER 122

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Form Approved. OMB No. 2050-0039. Expires 9-30-91 print or type. \*(Form designed for use on elite (12-pitch) typewriter.) 21. Generator's US EPA ID Na Manifest DocuM **UNIFORM HAZARDOUS** 22. Page 2 Information in the shaded areas is not required by Federal **WASTE MANIFEST** -AKD00850701 Jaw. (Continuation Sheet) AKD000850701 23 Generator's Name Alaska Petroleum, Inc. L. State Manifest Document Number THE COMMENT OF THE COMMENT OF THE PROPERTY OF Worth Pole, Alaska 99005 24. Transporter Company Name N. State Transporter's ID 25. US EPA 1D Number O3Transported Shore 34 9871 2/6:5868 Total Reen Trailer Express WAD070397955 26. Transporter Company Name 27. US EPA ID Number P. State Transporters (D) Q. Transporter's Phone 4907) 275-4800 Lyaden Transport, Inc. WAD002799260 R. Waste No. 29. Containers 30. Total 28. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number) Type Quantity No. a 200 b. · 😸 . I · · · · · . 112 C. G d. E N E R 0. g. h. Mille N v. T. Handling Codes for Wastes Listed Above 32. Special Handling Instructions and Additional Information 33. Transporter Acknowledgement of Receipt of Materials Date Year Printed/Typed-Name Signature Month Day 16191 TOTE 34. Transporter \_\_\_\_\_Acknowledgement of Receipt of Materials Date Printed/Typed Name Month Day Signature Year 2/20/9/ KONAUD 35 Discrepancy Indication Space

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20. Facility Owner or Operator: Certification	n of receipt of hazardous mate	erials covered by this mo	anifest except as	noted in Item 19.	
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Please print or type. (Form designed for use on elite (12-pitch) typewriter.) Form Approved, OMB No. 2050-0039, Expires 9-30-91 UNIFORM HAZARDOUS 1. Generator's US EPA ID No. Manifest Document No. 2 Page 1 Management on in the shaded areas of age is not required by Federal law. AKD000850701 NPR06 WASTE MANIFEST 3. Generator's Name and Mailing Address A. State Manifest Document Number MAPCO Alaska Petroleum, Inc. 1100 H & H Lane, North Pole, AK B. State Generator's ID 4. Generator's Phone (907) 488-2741 5. Transporter 1 Company Name US EPA ID Number C. State Transporter's ID Northwest EnviroService, Inc. | AKD983068602 (907)272-9007 D. Transporter's Phone 7. Transporter 2 Company Name US EPA ID Number E. State Transporter's ID WAD002799260 Lynden Transport, Inc. (907)276-4800 F. Transporter's Phone 9. Designated Facility Name and Site Address US EPA ID Number G. State Facility's ID Northwest EnviroService, Inc. 1500 Airport Way S. H. Facility's Phone WAD058367152 (206) 622-1090 Seattle, WA 98134 12. Containers 14. Unit 11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number) Waste No. Total No. Type Quantity Wt/Vol E a. N D001 X Waste flammable liquid, n.o.s. DM 605 E R Flammable liquid, UN1993 T b. 0 Non-RCRA waste liquid 1 DM 55 G WTO2 C. X Waste flammable liquid, n.o.s. (naphthenes) 1 DM 35 G D001 Flammable liquid, UN 1993. WTO2 d. J. Additional Descriptions for Materials Listed Above K. Handling Codes for Wastes Listed Above WPQ# AK 1008 - Sump sludge - MA 0898-905, 942-946. 948 ab) SOIG TRIT WPQ# AK 1010 - Desalter sludge - MA 0910 b. C) SOIC, SODT, TSOT WPQ# AK 0781 - Paint thinner - MA 0888 15. Special Handling Instructions and Additional Information 16 GENERALUL'S CERTIFICATION: I nereu, declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, and 'acreed and 'acreed and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford. Printed (Typed Name Month Day McCullom Year 29190 17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name Signature Month Day Year ADDY REITER 8 129 18. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name Signature Month Day Year Kandy Larson 19. Discrepancy Indication Space Line #18. Transporter a Did not Door Manifest. 20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19 Printed/Typed Name Signature Montr. Day Year atrick interes

EPA Form 8700-22 (Rev. 9-88) Previous editions are obsolete

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Form Approved, OMB No. 2050-0039, Expires 9-30-9

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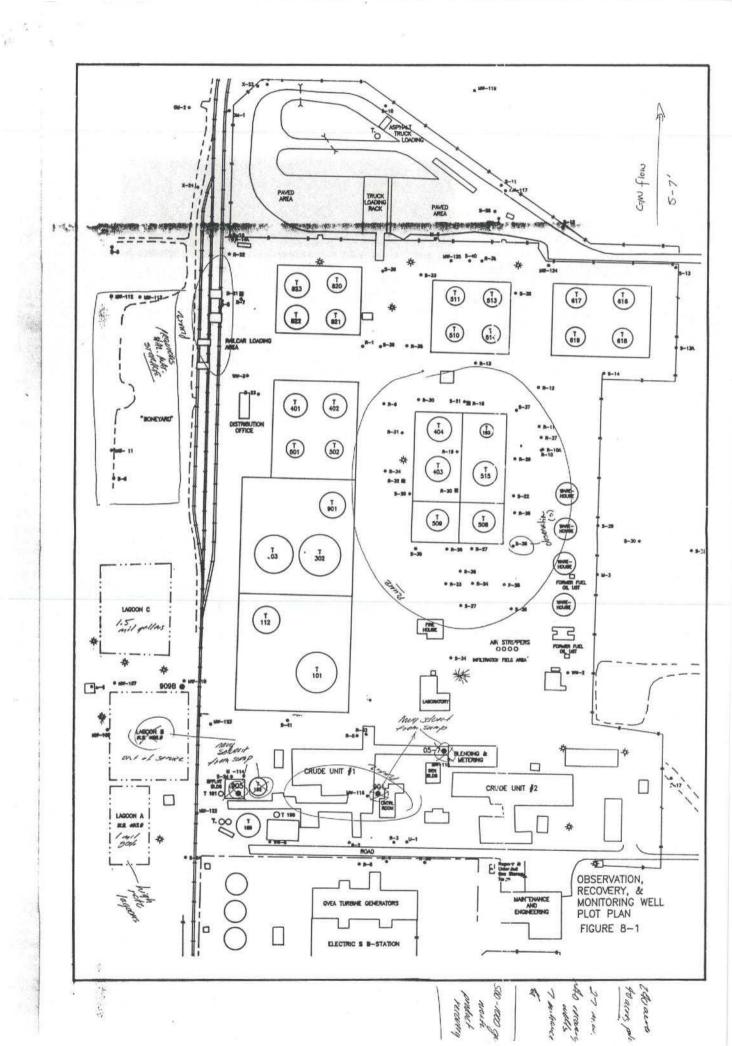
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Form Approved. OMB No. 2050-0039 Expires 9-30-91

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# ATTACHMENT #2



# ATTACHMENT #3



# CO-041 MAPCO ALASKA PETROLEUMINC.

RECEIVED

JUL 3 1 1991

ANCHORAGE-A00/A

1100 H&H LANE NORTH POLE, ALASKA 99705 (907) 488-2741

July 31, 1991

Kurt Eilo Hazardous Waste Coordinator U.S. Environmental Protection Agency 222 West 7th Ave., Box 19 Anchorage, AK 99513-7588

Re: Satellite Areas

Dear Mr. Eilo,

As a result of the RCRA Compliance Investigation of MAPCO ALASKA PETROLEUM Inc.'s (MAPI) North Pole Refinery on July 29, you commented on the location of the laboratory's hazardous waste satellite area. A 35 gallon barrel is located directly outside the laboratory door and used for the storage of broken thermometers and hydrometers. No accumulation date was labeled on this barrel.

40 CFR §262.34(c)1 provides that "A generator may accumulate as much as 55 gallons of hazardous waste ... in containers at or near any point of generation where wastes initially accumulate ...". We understand that EPA as interpreted "near" to mean that you cannot pass through a doorway to access the container.

We at MAPI believe not only that we complied with both the letter and the spirit of the regulations, but also that the storage of this material within the laboratory would create an unnecessary health hazard; therefore, MAPI will continue to store this material in the same location and in the same manner with the exception that the accumulation date will be posted and tracked so that this material will be disposed of within the 270 days that is allowed for a small quantity generator located more than 200 miles from a disposal facility.

If you have any questions or comments concerning this issue, or any other issue that came to mind after the inspection, please call me at 488-0033.

Sincerely,

Kathleen McCullom

Environmental Coordinator
MAPCO ALASKA PETROLEUM Inc.

cc: G

G. Fritz

D. Rowse

J. Niedermeyer